

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

HANGZHOU CHIC INTELLIGENT  
TECHNOLOGY CO., LTD., and UNICORN  
GLOBAL, INC.,

Plaintiffs,

V.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A,

Defendants.

)  
)  
) Case No. 20-cv-4806  
)  
) Judge Thomas M. Durkin  
) Magistrate Judge Jeffrey Cole  
)  
)  
)  
)  
)

**DECLARATION OF XIE RONG QING IN SUPPORT OF MOVING  
DEFENDANT'S MOTION TO DISMISS THE  
COMPLAINT WITH PREJUDICE**

I, Xie Rongqing, declare as follows:

1. I am the owner of Dongguan Saibotan Nengyuan Keji Co., Ltd, which sells products under Amazon Seller ID “GYROOR US” (hereinafter referred to as “Moving Defendant”). I have personal knowledge of the facts stated herein and if called upon as a witness, I could and would competently testify to the below facts which are personally known to me.
2. The true and correct address for service of process to Dongguan Saibotan Nengyuan Keji Co., Ltd., in English, is “No. 1 Feida Rd. Building A, 2F, Zhangyang District, Zhangmutou Town, Guangdong, China 523637.” The same address in Chinese is “东莞市樟木头镇樟洋社区飞达路 1 号 A 栋二楼.”

3. I was directly involved and supervised the process of opening the “GYROOR US” storefront at Amazon.com on or about December 2019.
4. As part of this process, Amazon.com requested, and I provided, information regarding Moving Defendant, including the name of the company which I provided as “DongguanshisaiBOTannengyuankejiyouxiangongsi,” which is a Chinese transliteration of Dongguan Saibotan Nengyuan Keji Co., Ltd.; the address of the company which I provided as “feidalu1haoAdongerlou zhangyangshequ zhangmutouzhen guangdongsheng 523637 CN,” which is a Chinese transliteration of “No. 1 Feida Rd. Building A, 2F, Zhangyang District, Zhangmutou Town, Guangdong, China 523637”; and the email address of the company, which I provided as [ctd2020@outlook.com](mailto:ctd2020@outlook.com).
5. Exhibit “A” is a true and correct copy of a screenshot containing Moving Defendant’s seller information as listed on Amazon.com. This page is public information and can be reached at: [https://www.amazon.com/sp?\\_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA=&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A57BIIPQ5F3FT&ssmPath=](https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA=&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A57BIIPQ5F3FT&ssmPath=)
6. Exhibit “A” displays, under “Detailed Seller Information,” the name of the Moving Defendant as “DongguanshisaiBOTannengyuankejiyouxiangongsi,” which is a Chinese transliteration of Dongguan Saibotan Nengyuan Keji Co., Ltd.; the address of Moving Defendant as “feidalu1haoAdongerlou zhangyangshequ zhangmutouzhen guangdongsheng 523637 CN,” which is

a Chinese transliteration of “No. 1 Feida Rd. Building A, 2F, Zhangyang District, Zhangmutou Town, Guangdong, China 523637.”

7. Exhibit “B” is a true and correct screenshot of the homepage of Baidu.com, a popular search engine in China.
8. Exhibit “B” shows that entering the first few transliterated characters of Moving Defendant’s company name into the Baidu.com search box automatically returns a suggested search term “东莞市赛博坦能源科技有限公司,” which is Moving Defendant’s company name in Chinese.
9. Exhibit “C” is a true and correct screenshot of the first five (5) search results generated by Baidu.com when clicking through the suggested search term of Exhibit “B.”
10. Exhibit “C” shows Moving Defendant’s address “No. 1 Feida Rd. Building A, 2F, Zhangyang District, Zhangmutou Town” in no less than three (3) of the first five (5) search results. A fourth search result displays a truncated portion of the address.
11. Exhibit “D” is a true and correct copy of an email sent by Christopher Binns to the [ctd2020@outlook.com](mailto:ctd2020@outlook.com) account on or about December 29, 2020 that apparently contains court documents related to the present case.
12. Nowhere in Exhibit “D,” nor at any other time, was I informed or did I have knowledge of Christopher Binns or any other person representing Plaintiff who requested the address information of Moving Defendant for the purposes of Hague Service.

13. Exhibit "E" is a true and correct copy of an email I sent from the ctd2020@outlook.com account to Christopher Binns on or about December 30, 2020.
14. Exhibit "E" shows that Moving Defendant provided its address for the purposes of Hague Service to Christopher Binns, in English as "No. 1 Feida Rd. Building A, 2F, Zhangyang District, Zhangmutou Town, Guangdong, China 523637," and in Chinese as "东莞市樟木头镇樟洋社区飞达路 1 号 A 栋二楼."
15. I have seen a Chinese translation of this English declaration and upon information and belief declare this declaration to be true and correct.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based upon my personal knowledge. Executed this 14th day of January, 2021, in Guangdong, China.

By: Xie Rongqing  
Xie Rongqing

# Exhibit A

# GYROOR US

GYROOR US storefront

88% positive in the last 12 months (89 ratings)

GYROOR US is committed to providing each customer with the highest standard of customer service.

Have a question for GYROOR US?

Ask a question

## Detailed Seller Information

**Business Name:**dongguanshisaiBOTANNENGYUANKEJIYOUXIANGONGSI

**Business Address:**

feidalu1haoAdongerlou zhangyangshequ  
zhangmutouzheng  
guangdongsheng  
523637  
CN

Feedback

Returns & Refunds

Shipping

Policies

Help

Gift Wrap

Products

"No issues. Product is of excellent quality and was received as promised."

By Brad Garner on January 4, 2021.

~~"Leaving feedback per your request. We returned the BROKEN hoverboard and will never buy another product from you again."~~

By Amazon Customer on December 31, 2020.

**Message from Amazon:** This item was fulfilled by Amazon, and we take responsibility for this fulfillment experience.

"Great service, Great hoverboard,A+++ "

By Jennifer Dunkum on December 28, 2020.

"We love the hoverboard. My 9 year old uses it all of the time. It is a sturdy well made problem. When he lost the charging cord, the company was great workin..."

[Read more](#)

By AthenaPurple on December 28, 2020.

"Received before expected date. Great "

By Debbie Steele on December 24, 2020.

	30 days	90 days	12 months	Lifetime
Positive	100%	98%	88%	88%
Neutral	0%	0%	0%	0%
Negative	0%	2%	12%	12%
Count	11	55	89	89



Previous [Next](#)

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Inspired by your browsing history

Page 1 of 5






Hover-1 Buggy Attachment for Transforming Hoverboard Scooter into Go-Kart

3,560


\$51.99



EverCross Hoverboard Seat Attachment, New Gen Hoverboard Seat with Safety Brake System,...

572


\$84.99



EverCross Hoverboard Seat Attachment, Hoverboard Attachments, Hoverboard Accessories Compatible...

336



\$79.99



SISIGAD Hoverboard Self Balancing Scooter 6.5" Two-Wheel Self Balancing Hoverboard with...

2,246

\$149.99 - \$298.00





Hiboy I-Accesso Straps

\$13.99

## Top subscription apps for you


Page 1 of 10



Disney+  
Disney

600,132

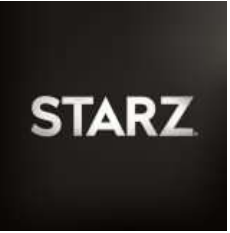
\$0.00



CBS Full Episodes and Live TV  
CBS Interactive

136,632


\$0.00



STARZ  
Starz Entertainment, LLC

111,973



\$0.00



Sling TV  
Sling TV LLC

64,865

\$0.00



SHOWT  
Showtin

\$0.00

## Your Browsing History [View or edit your browsing history](#)

Page 1 of 2













Hoverboard + Go Kart



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### Get to Know Us

[Careers](#)  
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[About Amazon](#)  
[Press Center](#)  
[Investor Relations](#)  
[Amazon Devices](#)  
[Amazon Tours](#)

### Make Money with Us

[Sell products on Amazon](#)  
[Sell apps on Amazon](#)  
[Become an Affiliate](#)  
[Advertise Your Products](#)  
[Self-Publish with Us](#)  
[Host an Amazon Hub](#)  
[See More Make Money with Us](#)

### Amazon Payment Products

[Amazon Rewards Visa Signature Cards](#)  
[Amazon.com Store Card](#)  
[Amazon Business Card](#)  
[Amazon Business Line of Credit](#)  
[Shop with Points](#)  
[Credit Card Marketplace](#)  
[Reload Your Balance](#)  
[Amazon Currency Converter](#)

### Let Us Help You

[Amazon and COVID-19](#)  
[Your Account](#)  
[Your Orders](#)  
[Shipping Rates & Policies](#)  
[Amazon Prime](#)  
[Returns & Replacements](#)  
[Manage Your Content and Devices](#)  
[Amazon Assistant](#)  
[Help](#)

English

United States

Amazon Music Stream millions of songs	Amazon Advertising Find, attract, and engage customers	Amazon Drive Cloud storage from Amazon	6pm Score deals on fashion brands	AbeBooks Books, art & collectibles	ACX Audiobook Publishing Made Easy	Alexa Actionable Analytics for the Web
Sell on Amazon Start a Selling Account	Amazon Business Everything For Your Business	Amazon Fresh Groceries & More Right To Your Door	AmazonGlobal Ship Orders Internationally	Home Services Experienced Pros Happiness Guarantee	Amazon Ignite Sell your original Digital Educational Resources	Amazon Rapids Fun stories for kids on the go
Amazon Web Services Scalable Cloud Computing Services	Audible Listen to Books & Original Audio Performances	Book Depository Books With Free Delivery Worldwide	Box Office Mojo Find Movie Box Office Data	ComiXology Thousands of Digital Comics	DPReview Digital Photography	East Dane Designer Men's Fashion
Fabric Sewing, Quilting & Knitting	Goodreads Book reviews & recommendations	IMDb Movies, TV & Celebrities	IMDbPro Get Info Entertainment Professionals Need	Kindle Direct Publishing Indie Digital & Print Publishing Made Easy	Amazon Photos Unlimited Photo Storage Free With Prime	Prime Video Direct Video Distribution Made Easy
Shopbop Designer Fashion Brands	Amazon Warehouse Great Deals on Quality Used Products	Whole Foods Market America's Healthiest Grocery Store	Woot! Deals and Shenanigans	Zappos Shoes & Clothing	Ring Smart Home Security Systems	eero WiFi Stream 4K Video in Every Room
	Neighbors App Real-Time Crime & Safety Alerts	Amazon Subscription Boxes Top subscription boxes – right to your door	PillPack Pharmacy Simplified	Amazon Renewed Like-new products you can trust	Amazon Second Chance Pass it on, trade it in, give it a second life	

Conditions of Use

Privacy Notice

Interest-Based Ads

© 1996-2020, Amazon.com, Inc. or its affiliates



# Exhibit B



www.baidu.com



dongguanshisaibotan



百度一下

百度首页

设置

登录

东莞市赛博坦能源科技有限公司

东莞市塞伯坦网络有限公司塞伯坦店鼠标

图 采购 更多

反馈

请按 回车 键发起搜索

# Exhibit C





东莞市赛博坦能源科技有限公司



百度一下

[百度首页](#)[设置](#)[登录](#)[网页](#) [资讯](#) [视频](#) [图片](#) [知道](#) [文库](#) [贴吧](#) [地图](#) [采购](#) [更多](#)

百度为您找到相关结果约9,860个

[搜索工具](#)

### 东莞市赛博坦能源科技有限公司

**Boart Energy**  
**博众能源**

东莞市赛博坦能源科技有限公司办公室地址位于珠江口东岸,广东历史文化名城东莞,东莞 东莞市樟木头镇樟洋社区飞达路1号A栋二楼,于2016年05月29日在东莞市工商行政管...

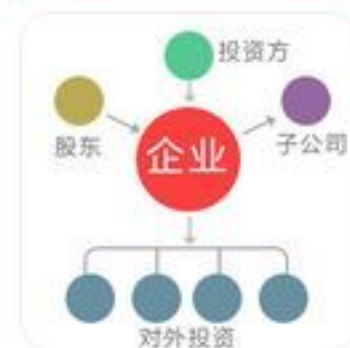
[www.11467.com/qiye/877626...htm](http://www.11467.com/qiye/877626...htm) [百度快照](#)

### 东莞市赛博坦能源科技有限公司

东莞市赛博坦能源科技有限公司 联系人:胡群 称谓:女士 职位: 电话:1:0769-87791560 手机: 传真:0769-87792560 地址: 邮编: 主页:官方网站 邮箱:给该公司发送邮件...

[company.dianyuan.com/889...html](http://company.dianyuan.com/889...html) [百度快照](#)

### 东莞市赛博坦能源科技有限公司 - 企业信息



东莞市赛博坦能源科技有限公司, 法定代表人:谢荣庆, 注册资金:500万元, 地址:东莞市樟木头镇樟洋社区飞达路1号A栋二楼, 经营范围:研发、生产、加工、销售:太阳能设备、电子产品、五金制品、通用机械设备及配件;销售:塑料制品;货物进出口、技术进出口。(...

[基本信息](#) [数据解读](#) [商标信息](#) [法律诉讼](#) [更多>](#)[爱企查](#)

其他人还在搜

[赛博坦在哪里](#) [赛博坦是什么样子的](#) [东莞市威望能源公司](#) [东莞市能优能源科技](#)  
[东莞市慧衍电子有限公司](#) [东莞市深华新能源有限公司](#) [塞伯坦之谜](#) [赛博坦巨龙](#)

### 东莞市赛博坦能源科技有限公司 工商注册信息 企业工商信息...

2020年12月21日 地址:东莞市樟木头镇樟洋社区飞达路1号A栋二楼 简介: 东莞市赛博坦能源科技有限公司成立于2016年05月29日,注册地位于东莞市樟木头镇樟洋社区飞达路1号...

[爱企查](#) [百度快照](#)

### 东莞市赛博坦能源科技有限公司 工商信息 风险信息 - 天眼查

东莞市赛博坦能源科技有限公司 我要认证 下载报告 风险监控 在业小微企业 电话:1343748\*\*\*登录查看 邮箱:13437484648@qq.com 网址:暂无网址 地址:东莞市樟木头镇...

[天眼查](#) [百度快照](#)

- HR和企业负责人必拿的招聘神器>>
- 无门槛,不花钱,就能招到人才>>
- 全网好工作,上百度百聘>>

### 东莞市赛博坦能源科技有限公司关系图\_爱企查



百度热榜

[换一换](#)

- 1 31省新增本土确诊107例:河北90例
- 2 外媒:美驻联合国大使取消访台
- 3 美众议院要求彭斯罢免特朗普
- 4 河北三地"封城" 为何与武汉不同
- 5 石家庄84例确诊详情:有人在食堂工作

# Exhibit D





Benjamin Kuo <bkuo@benasaur.com>

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**转发: Hangzhou Chic et al v. P'ships (GYROOR US), 20-cv-4806**

1 message

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谢 荣庆 <ctd2020@outlook.com>  
To: "bkuo@benasaur.com" <bkuo@benasaur.com>

Sun, Jan 3, 2021 at 11:43 PM

---

发件人: Christopher Binns <cbinns@loeb.com>  
发送时间: 2020年12月29日 10:13  
收件人: ctd2020@outlook.com <ctd2020@outlook.com>  
主题: Hangzhou Chic et al v. P'ships (GYROOR US), 20-cv-4806

To Whom It May Concern:

We represent the Plaintiffs in the above-referenced action. Per the attached Preliminary Injunction Order, please find attached the Third Amended Complaint, the Preliminary Injunction Order, and Plaintiffs' expedited discovery requests.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Christopher Binns

**Christopher Binns**  
*Attorney At Law*



345 Park Avenue | New York, NY 10154

Direct Dial: 212.407.4213 | Fax: 646.349.1805 | E-mail: [cbinns@loeb.com](mailto:cbinns@loeb.com)

Los Angeles | New York | Chicago | Nashville | Washington, DC | San Francisco | Beijing | Hong Kong | [www.loeb.com](http://www.loeb.com)

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**9 attachments**





**01 - FUS - Third Amended Complaint.pdf**

1293K



**14 - FUS - Exhibit 2.pdf**

880K



**18 - Exhibit 3.pdf**

1305K



**19 - Exhibit 4.pdf**

965K



**20cv4806 dkt 147.pdf**

1322K



**FUS - Schedule A.pdf**

25K



**Exhibit 1 Part 7 FILED UNDER SEAL.pdf**

1599K



**Expedited Discovery Requests (Defendant-Sch A).pdf**

211K



**Hangzhou Chic et al v. P'ships.zip**

6119K

# Exhibit E



Benjamin Kuo <bkuo@benasaur.com>

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**Fw: 回复: Hangzhou Chic et al v. P'ships (GYROOR US), 20-cv-4806**

1 message

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**sam@gyroor.com** <sam@gyroor.com>

Wed, Dec 30, 2020 at 11:22 PM

To: bkuo@benasaur.com

----- Original -----

**From:** 谢荣庆 <ctd2020@outlook.com>

**Send time:** Thursday, December 31, 2020 01:43 PM

**To:** sam@gyroor.com <sam@gyroor.com>

**Subject:** 回复: Hangzhou Chic et al v. P'ships (GYROOR US), 20-cv-4806

---

发件人: 谢荣庆 <ctd2020@outlook.com>

发送时间: 2020年12月30日 21:41

收件人: Christopher Binns <cbinns@loeb.com>

主题: 回复: Hangzhou Chic et al v. P'ships (GYROOR US), 20-cv-4806

To Whom It May Concern:

We received your email. We do not agree to waiver of service of process, nor to electronic service of process. You must comply with all aspects with the Hague Convention.

Our address is as follows:

No. 1 Feida Rd. Building A, 2F

Zhangyang District, Zhangmutou Town

Guangdong, China 523637

郵件已收到. 我方不同意免除送達, 也不接受電子形式送達. 你們必須嚴格按照海牙公約關於外國公司的送達要求, 向我司送達傳票和訴狀.

我方的送達地址為:

东莞市樟木头镇樟洋社区飞达路1号A栋二楼

Dongguan Saibotan Nengyuan Keji Co., Ltd.

东莞市賽博坦能源科技有限公司

Sincerely,

GYROOR US

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发件人: Christopher Binns <cbinns@loeb.com>

发送时间: 2020年12月29日 10:13

收件人: [ctd2020@outlook.com](mailto:ctd2020@outlook.com) <[ctd2020@outlook.com](mailto:ctd2020@outlook.com)>

主题: Hangzhou Chic et al v. P'ships (GYROOR US), 20-cv-4806

To Whom It May Concern:

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If you have any questions, please do not hesitate to contact me.

Sincerely,

Christopher Binns

**Christopher Binns**  
*Attorney At Law*



345 Park Avenue | New York, NY 10154

Direct Dial: [212.407.4213](tel:212.407.4213) | Fax: [646.349.1805](tel:646.349.1805) | E-mail: [cbinns@loeb.com](mailto:cbinns@loeb.com)

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## **Exhibit B**

Find things out, with one touch on Baidu

www.baidu.com

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## **Exhibit C**



**Baidu** Dongguan SaibotanNengyuanKeji Co., Ltd. Home Setting Login

Website News Video Picture Know Wenku Post Bar Map Purchase More

About 9,860 relevant results

Dongguan SaibotanNengyuanKeji Co., Ltd.

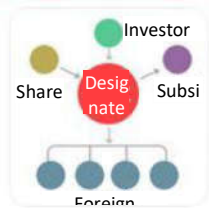
**Boart Energy**  
**Boart Energy**

Dongguan SaibotanNengyuanKeji Co., Ltd. is registered on May 29, 2016 with Dongguan Administration for Industry and Commerce, and has its office address registered at Building A, 2F, No. 1 Feida Rd., Zhangyang District, Zhangmutou Town, Dongguan City, which is located at the eastern bank of Pearl River Estuary.  
www.11467.com/qiye/877626...htm [Baidu Snapshot](#)

#### Dongguan SaibotanNengyuanKeji Co., Ltd.

Contacts of Dongguan SaibotanNengyuanKeji Co., Ltd.: Ms. Hu Qiong, Position: Tel 1: 0769-87791560 Fax: 0769-87792560 ADD: Zip Code: Homepage: Official Website: Email: company.dianyuan.com/889...html [Baidu Snapshot](#)

#### Dongguan SaibotanNengyuanKeji Co., Ltd.-Enterprise Info



Dongguan SaibotanNengyuanKeji Co., Ltd., legal representative: XieRongqing, registered capital: RMB 5 million, address: 2F, Building A, No. 1 Feida Rd., Zhangyang District, Zhangmutou Town, Dongguan City, business scope: R&D, production, processing and sales: solar energy equipment, electronic products, hardware products, general mechanical equipment and accessories; Sales: plastic products; Goods import&export, technologies import & export (...)

[Basic info](#) [Data interpretation](#) [Trademark info](#) [Legal actions](#) [More>](#)

[Aiqicha](#)

#### Other searching entries

Where is Saibotan? What is Saibotan like? [Dongguan Weiwang Energy Company](#) [Dongguan Nengyou Energy Technology](#) [Dongguan Huiyan Electronics Co., Ltd.](#) [Dongguan Shenhua New Energy Co., Ltd.](#) [Saibotan Mystery](#) [Saibotan Dragon](#)

#### Dongguan SaibotanNengyuanKeji Co., Ltd.-AIC registration info/Enterprise AIC registration...

Dongguan SaibotanNengyuanKeji Co., Ltd. is incorporated on May 29, 2016, and has its office address registered at Building A, 2F, No. 1 Feida Rd., Zhangyang District, Zhangmutou Town, Dongguan City (as of December 21, 2020).

[Aiqicha](#) [Baidu Snapshot](#)



- Recruitment App for HR and Enterprise Principal>>
- With no threshold and cost, you can recruit talents>>
- To hunt for a good job, go to Baidu Recruitment>>

#### **Relationship Diagram of Dongguan SaibotanNengyuanKeji Co., Ltd.-Aiqicha**





#### Baidu Hot Search

- 1 There are 107 newly diagnosed cases in 31 provinces: 90 cases in Hebei
- 2 Foreign media: the US cancels its Ambassador to the United Nations to pay a visit to Taiwan
- 3 The US House of Representatives asked Mike Pence to recall Trump
- 4 Why is the "city closure" of three places in Hebei different from Wuhan
- 5 Details of 84 confirmed cases in Shijiazhuang: Some people work in the canteen

[Dongguan SaibotanNengyuanKeji Co., Ltd.](#) [AIC information Risk info-Tianyancha](#)

[Dongguan SaibotanNengyuanKeji Co., Ltd.](#) I want to certify the downloaded report Risk monitoring Active SMEs Tel: 1343748\*\*\* Log in and check, email address: 13437484648@qq.com Website: N/A, Address: Zhangmutou Town, Dongguan City

 [Tianyancha](#)  [Baidu Snapshot](#)

**Abacus Consulting Services**

401 N. Garfield Ave. Ste 1, Alhambra, CA 91801 Tel: 626-487-8909 Fax: 626-282-9252  
Website: <http://www.certifiedchinesetranslation.com/> Email: [info@certifiedchinesetranslation.com](mailto:info@certifiedchinesetranslation.com)

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**CERTIFICATION OF TRANSLATION  
(Certified by Courts)**

This is to certify under the penalty of perjury that I am a court certified interpreter in California with license number #301138 and I am fluent in Chinese (Mandarin) and English languages, that the document(s) listed as

**Exhibit B  
Exhibit C**

is (are) complete and accurate translations of the original written document(s) to the best of my ability and knowledge.

I certify under penalty of perjury under the Laws of the State of California that the foregoing is true and correct.

Signed on January 14, 2021 in Los Angeles, California, USA



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